

**STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION**

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<b>IN THE MATTER OF:</b>	)	<b>DIVISION OF WATER POLLUTION</b>
	)	<b>CONTROL</b>
<b>HAMILTON COUNTY</b>	)	
<b>WASTEWATER TREATMENT</b>	)	
<b>AUTHORITY</b>	)	
	)	
<b>RESPONDENT</b>	)	<b>CASE NUMBER WPC07-0266</b>

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**ORDER AND ASSESSMENT**

NOW COMES James H. Fyke, Commissioner of the Tennessee Department of Environment and Conservation, and states:

**PARTIES**

**I.**

James H. Fyke is the duly appointed Commissioner of the Tennessee Department of Environment and Conservation (hereinafter the "Department").

**II.**

Hamilton County Wastewater Treatment Authority, (hereinafter the "Respondent") owns and operates Signal Mountain Sewage Treatment Plant (STP) located on Suck Creek Road in Hamilton County, Tennessee. Service of process may be made on the Respondent through the Respondent's chairperson, Henry Hoss, P.O. Box 8856, Chattanooga, Tennessee, 37414.

## JURISDICTION

### III.

Whenever the Commissioner has reason to believe that a violation of Tennessee Code Annotated (T.C.A.) Section 69-3-101 *et seq.*, the Water Quality Control Act, (hereinafter the "Act") has occurred, or is about to occur, the Commissioner may issue a complaint to the violator, and the Commissioner may order corrective action be taken pursuant to T.C.A. §69-3-109(a) of the Act. Further, the Commissioner has authority to assess civil penalties against any violator of the Act, pursuant to T.C.A. §69-3-115 of the Act; and to assess damages incurred by the state resulting from the violation, pursuant to T.C.A. §69-3-116 of the Act. The Water Quality Control Board has promulgated rules governing general water quality criteria, and use classifications for surface waters have been promulgated pursuant to T.C.A. §69-3-105 and are effective as the *Official Compilation Rules and Regulations of the State of Tennessee*, Chapters 1200-4-3 and 1200-4-4 ("Rule").

### IV.

The Respondent is a "person" as defined at T.C.A. §69-3-103(20). As hereinafter stated, the Respondent has violated the Act.

### V.

T.C.A. §69-3-108 requires that a person obtain a permit from the Department prior to discharges into waters of the state. Rule 1200-4-5-.08 states, in part, that a set of effluent limitations will be required in each permit that will indicate adequate operation or performance of treatment units used, and that appropriately limit those harmful parameters present in the wastewater. Furthermore, it is unlawful for any person to increase the volume or strength of any wastes in excess of the permissive discharges specified under any existing permit.

## FACTS

### VI.

On March 31, 2006, the Division of Water Pollution Control (hereinafter the "Division") issued National Pollutant Discharge Elimination System (hereinafter "NPDES") Permit TN0021211 (hereinafter the "permit") to the Respondent. The permit became effective on May 1, 2003. It was subsequently modified on October 1, 2007, and expires on March 30, 2008. The permit authorizes the Respondent to discharge treated municipal wastewater to the Tennessee River at mile 453.7 in accordance with effluent limitations, monitoring requirements and other conditions established in the permit. In addition, the permit places a moratorium on any additional connections to the system with the exception of the new school campus and any other contractual agreements developed and signed before June 11, 2007.

In addition to the moratorium, the Respondent was required to submit a list of all connections that were contractually approved before June 11, 2007. To date, the Respondent has not submitted this list to the Division.

### VII.

The Tennessee River is "waters of the state," as defined by T.C.A. §69-3-103(33). Pursuant to T.C.A. §69-3-105(a)(1), all waters of the state have been classified by the Tennessee Water Quality Control Board for suitable uses. Department Rule 1200-4-4, Use Classifications for Surface Waters, is contained in the Rules of Tennessee Department of Environment and Conservation, Division of Water Pollution Control Amendments. Accordingly, the Tennessee River is classified for the following uses: industrial water supply, navigation, fish and aquatic life, recreation, irrigation, livestock watering and wildlife.

## VIII.

Division personnel conducted a Compliance Evaluation Inspection (CEI) at the Respondent's STP on February 12, 2004. The purpose of the CEI was to determine compliance with the Respondent's NPDES permit requirements and to review the overall operation and maintenance of the STP. Division personnel observed that the influent flow meter was out of service and that the plant was bypassing during the inspection.

## IX.

On February 24, 2004, Division personnel sent the Respondent a report detailing the CEI conducted on February 12, 2004. In the report, Division personnel rated 11 different areas of operation as satisfactory, marginal, or unsatisfactory. Of those areas rated, the STP received an unsatisfactory rating in 7 out of the 11 areas including; records and reporting, facility site review, flow measurement, self-monitoring, compliance schedule, sewer overflows, and effluent/receiving waters. In the area of sludge handling, the facility received a marginal rating. A review of the laboratory bench sheets showed that the Respondent had recorded influent flow when the STP had no functioning flow meter. Also noted in the inspection report were over 45 instances of sewage bypasses. The exact number of bypasses was unknown due to the inoperable flow meter. No overflows of the collection system were reported.

Division personnel requested that a written response to the findings of the CEI be sent to the Division by March 26, 2004, outlining the corrective actions that would be taken to address the violations specified in the inspection report.

## X.

In a letter dated March 23, 2004, the Respondent answered the February 24, 2004, NOV. In the letter, the Respondent stated that the violations were being addressed with the installation of new flow meters that were equipped with alarms to signal maximum flow. Also mentioned in the letter was an upcoming project to televise and map the collection system.

## XI.

Division personnel conducted a Compliance Evaluation Inspection (CEI) at the Respondent's STP on September 14, 2005, and observed that a new influent flow meter had been installed since the last inspection. Division personnel also noted that temperatures in the sampling units were not at the correct temperatures and that the clarifier was not in operation during the inspection.

## XII.

On January 26, 2006, Division personnel sent the Respondent a report detailing the results of the CEI. In the report, Division personnel rated 11 different areas of operation. The sewer overflow rating was still classified as unsatisfactory. Although there were no reported overflows during 2005, the Respondent reported over 40 bypasses of sewage, indicating a severe problem with inflow and infiltration (I&I) of storm water into the collection system, resulting in the unsatisfactory rating. Marginal ratings were given on the facility site review and self-monitoring because the clarifier was not in service during the inspection, and the sampling units were not at the correct temperatures.

### **XIII.**

On February 13, 2007, a compliance review meeting was held at the Chattanooga Environmental Field Office to discuss the facility's chronic bypass problems. Also discussed was the desire of the Respondent to expand the sewer lines going from the school, to include a new development that would add up to 1000 new residential homes to the collection system. During the meeting, Division personnel discussed with the Respondent two possible options. Option 1 would be a Commissioner's Order in response to the documented violations, and Option 2 would be a modified permit with a compliance schedule that would include the following items:

- An immediate moratorium on additional connections to the system;
- A plan, due within 90 days, to reduce the number of bypasses;
- A sufficient number of meters installed in all areas of the system, necessary to evaluate the overall effectiveness of the plan; and
- Alternative options available to improve the current STP, replace the STP, or connect to Chattanooga's Moccasin Bend wastewater treatment plant.

### **XIV.**

On October 1, 2007, a modified permit was issued to the Respondent, which incorporated an immediate moratorium on any new additions to the system, except for those contractually approved prior to June 11, 2007.

### **XV.**

During the monitoring period of January 2005 through December 2007, the Respondent reported 131 bypasses of treatment; and 1 overflow in the collection system, which constitutes an

unpermitted discharge.

Explanations provided by the Respondent along with the discharge monitoring reports, stated that all flows up to 1.5 MGD were treated and all flows in excess of 1.5 MGD were diverted around the plant but did receive disinfection via the chlorine contact chamber. The Respondent's facility is designed to handle flows up to .4 MGD.

### VIOLATIONS

#### **XVI.**

By discharging wastewater effluent in violation of the terms and conditions of its NPDES permit and by discharging wastewater from a location other than a permitted outfall, as stated above, the Respondent has violated T.C.A. §§ 69-3-108(b)(1),(2), and (6), and 69-3-114(b), which state in-part:

#### **T.C.A. §69-3-108**

(b) It is unlawful for any person, other than a person who discharges into a publicly owned treatment works or a person who is a domestic discharger into a privately owned treatment works, to carry out any of the following activities, except in accordance with the conditions of a valid permit:

- (1) The alteration of the physical, chemical, radiological, biological, or bacteriological properties of any waters of the state;
- (2) The increase in volume or strength of any wastes in excess of the permissive discharges specified under any existing permit;
- (6) The discharge of sewage, industrial wastes, or other wastes into water, or a location from which it is likely that the discharged substances will move into waters;

#### **T.C.A. §69-3-114**

(b) It shall be unlawful for any person to act in a manner or degree, which violates any provision of this part or of any rule, regulation, or standard of water quality promulgated by the board or of any permits or orders issued pursuant to the provisions of this part.

## **ORDER AND ASSESSMENT**

### **XVII.**

WHEREFORE, pursuant to the authority vested by T.C.A. §§69-3-107, 109, 115-16, I, James H. Fyke, hereby issue the following ORDER AND ASSESSMENT to the Respondent:

1. The Respondent shall, within 90 days of receipt of this Order, submit for approval by the Division, a corrective action plan/engineering report (CAP/ER) on the system. The CAP/ER shall include, but shall not be limited to, modifications to equipment or operations necessary to comply with all provisions of the subject NPDES permit, and a project schedule including timetables for beginning and completing all activities. The Respondent shall submit the CAP/ER in duplicate to the manager of the Division's Environmental Field Office in Chattanooga (EFO-CH) at 540 McCallie Avenue, Chattanooga, Tennessee 37402, and to the manager of the Enforcement and Compliance Section of Water Pollution Control at 401 Church Street, 6<sup>th</sup> Floor L&C Annex, Nashville, Tennessee 37243. In addition, all correspondence regarding this Order shall include the Order number, item number, and county.

2. The Respondent shall, within 60 days of receipt of the Division's written approval, initiate the actions outlined in the CAP/ER, including those items required by the Division as comments in the approval of the CAP. At the time of first action on the CAP/ER, the Respondent shall notify the Division in writing of the action. This written notification shall be submitted in duplicate to the manager of the EFO-CH and to the manager of the Enforcement and Compliance Section of Water Pollution Control at the respective addresses in Item 1.



3. All scheduled activities in the approved CAP/ER shall be complete within 36 months of receipt of this ORDER and ASSESSMENT. A notice of completion shall be submitted in duplicate to the manager of the EFO-CH and to the manager of the Enforcement and Compliance Section of Water Pollution Control at the respective addresses in Item 1.

4. Within 60 days of receipt of this Order, the Respondent shall submit to the Division, a sewer overflow response plan (SORP). The SORP shall include procedures for minimizing health impacts and shall include measures to be taken when overflows discharge on local streets or other public areas. The SORP shall also include appropriate measures for the notification of affected property owners and stream users, and shall include notification of the news media when necessary to protect public health. The SORP shall state specific procedures for notifying known downstream users in the event that untreated wastewater is discharged to waters of the state by sanitary sewer overflow (SSO). These procedures shall include, but not be limited to, provisions for posting warning signs at places where the general public could gain access to polluted waters. Further, posted signs shall remain in place until in-stream monitoring reveals that the water body has returned to normal background conditions. In the event that the Division requires the Respondent to modify/revise the SORP, the Respondent shall submit the modified/revised SORP to the Division within thirty days of the date of notification. The SORP shall be submitted in duplicate to the manager of the EFO-CH and to the manager of the Enforcement and Compliance Section of Water Pollution Control at the respective addresses in Item 1.

5. Within 30 days of written approval by the Division, the Respondent shall fully implement the SORP. The Respondent shall notify the Division, in writing, once the SORP has been fully

implemented. The notification shall be submitted in duplicate to the manager of the EFO-CH and to the manager of the Enforcement and Compliance Section of Water Pollution Control at the respective addresses in Item 1.

6. Within 120 days of receipt of this Order, the Respondent shall revise or develop, and submit to the Division for review and comment, the following Maintenance Operation and Management (MOM) programs which shall be comprehensive of the entire system, and shall specifically address the plant, pump stations, and collection system. The MOMs program shall also include but not be limited to the items identified below:

- a. Identification of major goals of the MOM program;
- b. Identification of the person or position within the Respondent's STP responsible for implementing each of the elements of the MOM program;
- c. Procedures for training of appropriate personnel on a regular basis regarding elements of the MOM program;
- d. Identification of the means by which the mapping of the collection and transmission system is accomplished and maintained;
- e. Physical inspection and testing procedures of the plant, pump stations, and collection system;
- f. Preventive and routine maintenance procedures;
- g. Procedures for the maintenance of right-of-ways and easements for the sanitary sewer lines;
- h. Inventory management system;

- i. Program and procedures to identify and prioritize structural deficiencies and implementation of short term and long-term rehabilitation actions to address identified deficiencies;
- j. Requirements and standards for the installation of new sewers, pumps and other appurtenances, and rehabilitation and repair projects;
- k. Procedures and specifications for inspecting and testing the installation of new sewers, pumps and other appurtenances, and for rehabilitation and repair projects;
- l. Comprehensive plan to eliminate inflow and infiltration (I&I) into the system. The plan shall include but not be limited to an identification system for all potential overflow points (POPs) in the collection system. The system should identify the specific line that the POPs are on and should reflect the proximity of the POPs to other POPs on that line; and
- m. Procedures to update MOM program elements as appropriate.

The programs shall be submitted to the EFO-CH and a copy to the manager of the Enforcement and Compliance Section at the respective addresses in Item 1. Each individual MOM program will have a sufficient level of documentation to ensure the following:

- i. The program is specific to, and tailored for, the utility's infrastructure;
- ii. The program has a written purpose explaining why the program is needed;
- iii. The program has specific written goal(s) establishing the accomplishment(s) desired for the current fiscal year;
- iv. The program has the details of the standard operating procedures that are used by the utility's personnel;

- v. The program has established appropriate performance procedures which are tracked by management; and
- vi. The program has a written procedure requiring periodic review, evaluation, and any necessary revision.

7. The Respondent shall submit an annual report detailing all updates and changes to any of the individual MOM programs. Each annual report shall be due on March 31<sup>st</sup> and shall be based upon the activities conducted in the previous calendar year. The first annual report shall be submitted on March 31, 2009, for the 2008 calendar year. The annual reports shall be submitted in duplicate to the manager of the EFO-CH and to the manager of the Enforcement and Compliance Section of Water Pollution Control at the respective addresses in Item 1. Each annual report shall also include the following:

- a. A completed system profile and performance summary as outlined in Exhibit A;
- b. A completed system-wide MOM programs recent performance summary as outlined in Exhibit B;
- c. A completed sub-basin statistics summary spreadsheet as outlined in Exhibit C;
- d. A five-year capital improvement program with projected budgets for each item;
- e. A narrative description of the status of all contracted wastewater improvement projects, all in house replacement and rehabilitative projects, and the funding status of all improvement projects; and
- f. Appropriate maps and any additional documents necessary to fully describe the system status and aid in review.

8. Within 1 year of receipt of this Order, the Respondent shall maintain the capacity, collection, and treatment evaluation protocols. These protocols shall include, but not be limited to, standard design flow rate assumptions (regarding pipe roughness, manhole head losses, "as-built" drawing accuracy [distance and slope], and water use [gallons per capita per day]), and projected flow impact modeling/calculation techniques. The program shall provide for certification of adequate capacity by a registered professional engineer. The program shall include an information management system for tracking the cumulative studies and relating studies to the infiltration/inflow reduction program. Documentation that this item has been completed shall be submitted in duplicate to the manager of the EFO-CH and to the manager of the Enforcement and Compliance Section of Water Pollution Control at the respective addresses in Item 1.

9. The Respondent shall remain under the moratorium imposed under the last permit, which states:

An immediate moratorium is placed on additional connections to the Signal Mountain collection system with the exception of the new school campus and any contractual agreements developed and signed before June 11, 2007. All connections that were contractually approved prior to June 11, 2007, shall be placed on a written list and submitted to the Division along with copies of the signed and dated contractual agreements within 30 days of the issuance date of this permit. This moratorium shall remain in effect until the permittee has satisfied the Division that wastewater overflows and bypassing have been effectively eliminated.

As the Respondent has not already done so, the Respondent shall, within 30 days of receipt of this Order, submit to the Division a complete list of all connections to which the Respondent was contractually committed prior to June 11, 2007. The list shall be submitted in duplicate to the

manager of the EFO-CH and to the manager of the Enforcement and Compliance Section of Water Pollution Control at the respective addresses in Item 1.

It shall be the Respondent's responsibility to enforce the terms of this moratorium and maintain records of all connections or extensions to allow for audits by the Department. At any time, the Respondent may present to the Division a written request, with supporting data and a list of commitments, for partial or total relaxation of the moratorium for good cause shown. Under no circumstances shall the Respondent make any new connections or consider that the Department has relaxed any part of the moratorium without express written consent.

10. The Respondent shall complete all requirements of the Order and achieve full compliance with the permit no later than December 31, 2013. Written notification shall be submitted in duplicate to the manager of the EFO-CH and to the manager of the Enforcement and Compliance Section of Water Pollution Control at the respective addresses in Item 1.

11. The Respondent shall pay a CIVIL PENALTY of TWO HUNDRED FIFTY-SEVEN THOUSAND DOLLARS (\$257,000.00) to the Division, hereby ASSESSED to be paid as follows:

- a. The Respondent shall, within 30 days of receipt of this ORDER and ASSESSMENT, pay a CIVIL PENALTY in the amount of TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00).
- b. If, and only if, the Respondent fails to comply with item 1 above in a timely manner, the Respondent shall pay a CIVIL PENALTY in the amount of FOURTEEN THOUSAND DOLLARS (\$14,000.00), payable within 30 days of default.

- c. If, and only if, the Respondent fails to comply with item 2 above in a timely manner, the Respondent shall pay a CIVIL PENALTY in the amount of FOURTEEN THOUSAND DOLLARS (\$14,000.00), payable within 30 days of default.
- d. If, and only if, the Respondent fails to comply with item 3 above in a timely manner, the Respondent shall pay a CIVIL PENALTY in the amount of FOURTEEN THOUSAND DOLLARS (\$14,000.00), payable within 30 days of default.
- e. If, and only if, the Respondent fails to comply with item 4 above in a timely manner, the Respondent shall pay a CIVIL PENALTY in the amount of FOURTEEN THOUSAND DOLLARS (\$14,000.00), payable within 30 days of default.
- f. If, and only if, the Respondent fails to comply with item 5 above in a timely manner, the Respondent shall pay a CIVIL PENALTY in the amount of FOURTEEN THOUSAND FIVE HUNDRED DOLLARS (\$14,000.00), payable within 30 days of default.
- g. If, and only if, the Respondent fails to comply with item 6 above in a timely manner, the Respondent shall pay a CIVIL PENALTY in the amount of FOURTEEN THOUSAND DOLLARS (\$14,000.00), payable within 30 days of default.
- h. If, and only if, the Respondent fails to comply with item 7 above in a timely manner, the Respondent shall pay a CIVIL PENALTY in the amount of FOURTEEN THOUSAND DOLLARS (\$14,000.00), payable within 30 days of default.
- i. If, and only if, the Respondent fails to comply with item 8 above in a timely manner, the Respondent shall pay a CIVIL PENALTY in the amount of FIVE THOUSAND DOLLARS (\$5,000.00) per report, not to exceed a total of TWENTY THOUSAND DOLLARS (\$20,000.00) for all reports, payable within 30 days of default.

- j. If, and only if, the Respondent fails to comply with item 9 above in a timely manner, the Respondent shall pay a CIVIL PENALTY in the amount of TEN THOUSAND DOLLARS (\$10,000.00) per sewer hook-up, not to exceed a total of ONE HUNDRED THOUSAND DOLLARS (\$100,000.00) for all sewer connections that were connected in violation of the terms of the moratorium and this ORDER, payable within 30 days of default.
- k. If, and only if, the Respondent fails to comply with item 10 above in a timely manner, the Respondent shall pay a CIVIL PENALTY in the amount of FOURTEEN THOUSAND DOLLARS (\$14,000.00), payable within 30 days of default.

11. The Respondent shall otherwise conduct business in accordance with the Act and rules promulgated pursuant to the Act.

The Department reserves the right to request modifications to any of the scheduled requirements of this ORDER, as deemed necessary by the Director to achieve compliance with the Act. Requests by Respondents for any such modifications shall be submitted to the Director within the time frame to be determined by the Division. The Director may, for good cause shown, extend for a fixed time period, the compliance dates contained within this ORDER. In order to be eligible for this time extension, the Respondent shall submit a written request to be received in advance of the compliance date. The written request must include sufficient detail to justify such an extension and include at a minimum the anticipated length of the delay, the precise cause or causes of the delay, and all preventive measures taken to minimize the delay. Any such extension by the Division will be in writing. Should the Respondents fail to meet the



requirement by the extended date, any associated Civil Penalty shall become due 30 days thereafter.

### **NOTICE OF RIGHTS**

Tennessee Code Annotated §§ 69-3-109, 115, allow any Respondent named herein to secure review of this Order and Assessment. In order to secure review of this Order and Assessment, the Respondent must file with the Department's Office of General Counsel a written petition setting forth each of the Respondent's contentions and requesting a hearing before the Water Quality Control Board. The Respondent must file the written petition within THIRTY (30) DAYS of receiving this Order and Assessment. The petition should be sent to: "Appeal of Enforcement Order, TDEC-OGC, 20th Floor L & C Tower, 401 Church Street, Nashville, TN 37243-1548". The case number WPC07-0266 should be written on all correspondence regarding this matter. If the required written petition is not filed within THIRTY (30) DAYS of receipt of this Order and Assessment, the Order and Assessment shall become final and will be considered as an agreement to entry of a judgment by consent. Consequently, the Order and Assessment will not be subject to review pursuant to T.C.A. §§ 69-3-109 and 69-3-115.

Any hearing of this case before the Water Quality Control Board for which a respondent properly petitions is a contested case hearing, governed by T.C.A. § 4-5-301 et seq. (the Uniform Administrative Procedures Act) and the Department of State's Uniform Rules of Procedure for Hearing Contested Cases Before State Administrative Agencies. The hearing is in the nature of a trial before the board, sitting with an administrative law judge. The respondent may subpoena witnesses on its behalf to testify.

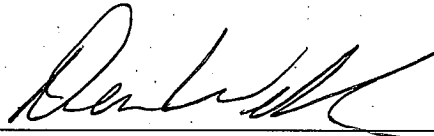
If the respondent is an individual, the respondent may either obtain legal counsel representation in this matter, both in filing its written petition and in presenting evidence at the hearing, or proceed without an attorney. Low-income individuals may be eligible for representation at no cost or reduced cost through a local bar association or legal aid organization. It is the Department's position that corporations, limited partnerships, limited liability companies, and other artificial entities created by law must be represented in any legal proceeding resulting from an appeal of this Order and Assessment by an attorney licensed to practice law in the state of Tennessee.

Furthermore, in the event the Board finds that the Respondent is responsible for the alleged violations after a hearing, the Board has the authority to assess additional damages incurred by the Department including, but not limited to, all docketing expenses associated with the setting of the matter for a hearing and the hourly fees incurred due to the presence of an administrative law judge and a court reporter.

Issued by the Commissioner of the Tennessee Department of Environment and Conservation on this 20<sup>th</sup> day of March, 2008.

James H. Fyke  
James H. Fyke, Commissioner  
Tennessee Department of Environment and  
Conservation

Payment of the civil penalty shall be made to "Treasurer, State of Tennessee" and shall be sent to the Devin M. Wells, Office of General Counsel, Tennessee Department of Environment and Conservation, 20th Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1548. The case number, shown on the first page of this Order and Assessment, should be included on the payment. All other correspondence and other communications regarding this matter should be directed to the Devin M. Wells, Office of General Counsel, Tennessee Department of Environment and Conservation, 20th Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1548, Telephone (615) 532-0131. The case number, shown on the first page of this Order and Assessment, should be included on all correspondence regarding this matter.

A handwritten signature in black ink, appearing to read 'Devin M. Wells', is written over a horizontal line.

Devin M. Wells, BPR #021059

**Exhibit A**

**SYSTEM PROFILE AND PERFORMANCE SUMMARY**

**Population Served:** ..... \_\_\_\_\_

**Number of Customers:** ..... \_\_\_\_\_

**Number of Treatment Plants:** ..... \_\_\_\_\_

**Total Wastewater Design Treatment Capacity:** \_\_\_\_\_

**Total Volume of Wastewater Treated:** ..... \_\_\_\_\_

**Miles of Gravity Sewers:** ..... \_\_\_\_\_

**Number of Manholes:** ..... \_\_\_\_\_

**Number of Inverted Siphons:** ..... \_\_\_\_\_

**Number of Pump Stations:** ..... \_\_\_\_\_

**Miles of Force Main:** ..... \_\_\_\_\_

**Number of Employees:** ..... \_\_\_\_\_

**Annual Capital Improvement Budget:** ..... \_\_\_\_\_

**Annual Operation and Maintenance Budget:** ... \_\_\_\_\_

**Total Annual Operating Budget:** ..... \_\_\_\_\_

## Exhibit B

System-Wide MOM Programs Recent Performance Summary														
Performance Measures for Previous 12 Months		Year	Month											
A. Number of Customer Complaints														
B. Number of NPDES Permit Violations														
C. Number of Capacity-Related Overflows														
D. Number of Maintenance-Related Overflows														
E. Number of Operations-Related Overflows														
F. Number of Blockages														
G. Number of Cave-Ins														
H. Number of Pump Station Failures														
I. Peak Flow Factor at Treatment Plant (1 hour high/dry month avg.)														
J. Monthly Average Treatment Plant Flow Rate (gal/capita/day)														
K. Monthly High One Day Treatment Flow Rate (gal/capita/day)														
L. Number of By-Passes at Treatment Plant														
M. Volume of Treatment Plant By-Passes (gal)														
N. WWTP Weekly Average Influent BOD (mg/L)														

## **Exhibit C**

### **Basin Name/Number**

**Data shall be entered basin by basin unless otherwise noted**

# Gravity Lines per  
Basin(feet)  
# Force main per  
Basin(feet)  
# Connections per  
basin

### **Overflows**

# Overflows per Basin  
# Estimated Gallons of  
Overflows Total per  
Basin  
# Overflows Reaching  
Waters  
# Estimated Gallons of  
Overflows Reaching  
Waters  
# Overflows at  
Treatment Plant  
# Dry Weather  
Overflows per Basin  
# Wet Weather  
Overflow Events per  
NPDES Permit  
Language  
# Wet Weather  
Overflow Individual  
Releases  
# Overflows Cleaned  
Up  
# Overflows Reported  
via paper or electronic  
DMR  
# Overflows Initial  
Report Notification to  
TDEC  
# Overflows Follow-up  
Report Sent to TDEC  
within 5 Days  
# Building Backups Due  
to Public System  
Failure during Dry  
Weather  
# Building Backups Due  
to Public System  
Failure during Wet  
Weather

### **Complaints**

# Complaints Received  
# Complaints Investigated  
# Complaints Resolved  
# Complaints determined to be Customer Private Line Issues

**Assessment and Prioritization**

**Corrosion**

# Locations Subject to Corrosion  
# Corrosion Inspections Conducted  
# Corrosion Defects Identified

**Manholes**

# Manholes per Basin  
# Manholes Inspected during the Calendar Year  
# Manholes Inspected since Program Began  
# Manholes with Defects

**Flow Measurement**

Year of Most Recent Flow Monitoring  
Peak Flow Observed During Monitoring Period(gpd)  
Instantaneous Peak Flow Observed (gpm/cfm)  
Average Flow Observed during Monitoring Period (gpd)  
Low Flow Observed during Monitoring Period (gpd)  
List Basins that Contribute Flow to this Basin

**CCTV Inspection**

# Feet Inspected by  
CCTV this Calendar  
Year

# Feet Inspected since  
Program Began

# Feet Cleaned for  
Inspection

# Feet Cleaned for  
Routine or Scheduled  
Maintenance

# Defects Identified by  
CCTV Inspection

# Defects Catalogued  
or Recorded into  
Database

### **Smoke Testing**

# Feet Smoke Tested  
this Year

# Leaks Identified on  
Public System

# Public System Leaks  
Repaired

# Public System Leaks  
Not Repaired This Year

# Public Leaks Not  
Repaired Since  
Program Began

# Leaks Identified on  
Private Service  
Connections

# Private Service Leaks  
Repaired

# Private Leaks  
Identified but Not  
Repaired This Year

# Private Leaks Not  
Repaired Since  
Program Began

### **Gravity Line Rehabilitation**

# Feet Gravity Lines  
Rehabilitated

# Feet Rehabilitated  
Since Program Began

# Feet Replaced

# Feet Replaced Since  
Program Began

# Feet Sliplined



# Feet Sliplined Since  
Program Began  
# Feet Cured in Place  
# Feet Cured in Place  
Since Program Began  
# Manholes  
Rehabilitated  
# Manholes  
Rehabilitated Since  
Program Began  
# Manholes Replaced  
# Manholes Replaced  
Since Program Began  
# Feet of Gravity Line  
Rehabilitation Inspected  
# Feet Of Gravity Line  
Rehabilitation Tested

**Grease Program**

# Facilities Required to  
have a Grease Device  
# Facilities with  
Installed Grease  
Devices  
# Grease Installation  
Inspections Conducted  
and Documented  
# Routine Grease  
Inspections  
# Facilities Inspected  
for Compliance with  
Grease Ordinance  
# Grease NOV's to  
System Users  
# Fines issued to  
Grease Generators  
# Grease Generators  
Water Service  
Discontinued

**Other Inspections**

# Construction  
Inspections  
# Pumps Station  
Inspections  
# Documented Pump  
Station Inspections